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VIA ECF

July 13, 2020

Hon. A. Kathleen Tomlinson, USMJ
100 Federal Plaza
P.O. Box 9014
Central Islip, NY 11722-9014

Re: USA v. Thomas Blaha
20CR220 JMA

Dear Judge Tomlinson:

During a telephone conference on June 30, 2020, defense counsel asked the Court to modify bond conditions, relating to three condominium units in Florida owned by defendant. The Court instructed the parties to discuss the matter and attempt to reach an agreement.

After consultation with the Government and with the Government's consent, as well as the consent of the two bond co-signors, defendant now asks the Court to modify the conditions of the bond as follows: Defendant's three Florida condominium units continue to be pledged as security for the bond. Defendant shall not be required to file any mortgage or other public record evidencing the pledge of the Florida condominium units as security for the bond. Defendant is permitted to list the Florida condominium units for sale. Upon sale of any unit, the entirety of net proceeds available to defendant shall be posted with the clerk of the court as further security for the bond, immediately upon receipt of said funds by defendant. Defendant shall provide supporting documentation to evidence the amount of net proceeds received by defendant.

I thank the Court for its courtesy and consideration.

Very truly yours,



Kevin B. Faga, Esq.

cc: AUSA Anna L. Karamigios, via email and ECF